

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

JULIO M. HERRERA-VELUTINI,
Defendant.

CRIMINAL NO. 22-342
(SCC)(GLS)

CONSENTED MOTION TO CONTINUE THE STATUS CONFERENCE

TO THE HONORABLE COURT:

Julio M. Herrera-Velutini, through his undersigned attorneys, respectfully files this consented motion requesting that the Court continue (for one day) the status conference set currently for September 26, 2024, to September 27, 2024.

This matter is presently scheduled for a status conference on September 26, 2024, as per the Court's scheduling order, Docket No. 615.

Unfortunately, counsel for Mr. Herrera, Christopher Kise, now has an unanticipated and irreconcilable scheduling conflict on that date. In litigation in which Mr. Kise has been lead counsel since inception, the Supreme Court of New York, Appellate Division, First Department, scheduled, *sua sponte*, oral argument in the case of *People v. Trump*, Case No. 2023-04925, for 2:00PM, on September 26, 2024 (see attached Exhibit A). That Court had previously ordered that the case must be heard during the September Term, but only recently announced the calendar setting argument for September 26. Therefore, there is no opportunity to reschedule this argument.

This Court's Status Conference will no doubt involve further discussion and engagement with the Court as to significant matters involving, *inter alia*, CIPA, discovery and the trial date. Mr. Kise anticipates having an active, substantive role at the status conference on behalf of Mr. Herrera. Granting the requested continuance will therefore allow for his participation but will not otherwise unduly delay the proceedings or prejudice any party.

The undersigned counsel has conferred with counsel for the United States and counsel for the other defendants in this matter. All counsel are available on September 27, 2024, just one day following the currently scheduled date, and therefore consent to the relief herein requested.

This Motion is not interposed for purposes of delay or for any other improper purpose.

WHEREFORE, Mr. Herrera respectfully requests that this Court enter an order continuing the status conference to September 27, 2024.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of August, 2024.

DLA Piper (Puerto Rico) LLC

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CERTIFICATE OF SERVICE

It is hereby certified that on this date, the present motion is filed with the Clerk of the Court through the CM/ECF electronic system, which will notify and provide copies to all parties of record.

/s/ Sonia I. Torres-Pabón